



Driving progress
through partnership

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June 3, 2020

Hon. Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square; Courtroom: 1305
New York, NY 10007

RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554

Dear Judge Engelmayer:

We write to request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file under seal two exhibits containing deposition testimony marked "Confidential" under seal and redact quotation to them in the text of Roc Nation's Opposition to HCC's Motion for the Issuance of a Letter of Request.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] allows counsel to designate deposition testimony as Confidential under Section 4. This obligates the party to file that confidential testimony under seal. Roc Nation's response includes citation to the testimony of two of HCC's party witnesses, and the transcripts are marked confidential. As a result, Roc Nation is requesting to file Exhibits A & C to the Opposition under seal, and redact the quoted language from the accompanying memorandum of law.

Good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the stipulation and order concerning confidentiality designations, and the parties understood that these confidentiality designations would apply at and during the time of the depositions in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions, but which the parties would not agree to make publically available. Furthermore, Roc Nation has attempted to narrow this request to the extent possible.

Very truly yours,

/s/ Amber Finch

Amber S. Finch

Granted. The Court appreciates the narrow tailoring of this request.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer".

PAUL A. ENGELMAYER
United States District Judge

June 4, 2020